

**BEFORE THE ENVIRONMENT COURT**

**ENV-2018-CHC-000041**

**IN THE MATTER** of the Resource Management Act 1991  
*(the Act)*

**AND**

**IN THE MATTER** of an appeal under Clause 14, Schedule 1 of  
the Act I

**BETWEEN** **HERITAGE NEW ZEALAND POUHERE  
TAONGA**

**Appellant**

**AND** **SOUTHLAND REGIONAL COUNCIL**

**Respondent**

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**Withdrawal of Appeal Point**

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May it please the Court

1. This memorandum seeks leave to withdraw the appeal of Heritage New Zealand Pouhere Taonga requesting the amendment of appendix S entitled "*Archaeological discovery without an authority (Protocol)*" in the Proposed Southland Water and Land Plan ('pSWLP').
2. Heritage New Zealand, Southland Regional Council and Ngāi Tahu agreed that the change requested in this appeal point would be made by the Southland Regional Council by way of clause 16(2) of Schedule 1 of the Resource Management Act 1991.
3. The Court is also requested to note that the writer has assumed the role of Counsel in this matter after the abrupt departure of the Solicitor on the Record, Camilla Owen, from the employment of Heritage New Zealand Pouhere Taonga.



GA Baumann

Signature of person authorised to sign  
on behalf of Appellant

19-04-22

Date

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